



**Department for Business & Trade –**

**Make Work Pay: Consultation on Leave for  
Bereavement, including Pregnancy loss**

**Unite the Union**

**Response**

**January 2026**

## About You

Unite is the UK's largest trade union with over 1.2 million members across all sectors of the economy, including health, transport, manufacturing, financial services, food and agriculture, information technology, service industries, construction, energy and utilities, local government and the not-for-profit sector. Unite also organises in the community, enabling those not in employment to be part of our union.

Equality is a pivotal element of Unite's comprehensive agenda, which encompasses job security, equitable pay, and favourable working conditions. To ensure that these values are actively promoted and upheld, we have established a dedicated equality department. This department supervises multiple Equality Committees, each designed to address the specific needs and challenges faced by various groups, including Women, individuals with disabilities, members of the LGBT+ committee, as well as Black and Asian, Ethnic Minorities (BAEM) groups, in addition to young workers. These committees play an essential role in advocating for inclusive practices and fostering an environment where every member can thrive, thereby enhancing the overall integrity and fairness of our organisation.

Unite has consistently championed equal opportunities, striving to eliminate barriers in the workplace and across all facets of society. As part of our commitment to this mission, we have conducted a thorough consultation process to gather comprehensive insights and concerns from each of our dedicated equality committees. Through this effort, we aim to amplify the voices of underrepresented groups and ensure their experiences shape our advocacy for a fairer, more inclusive environment for everyone.

Unite's response to this consultation has gathered comprehensive insights and perspectives from various stakeholders to enhance and inform the development of effective equality legislation. Our submission examines current challenges, best practices, and recommendations for enhancing bereavement leave, including for pregnancy loss. In preparing this submission, Unite surveyed our members on the areas covered in this consultation. Their contributions are featured as quotes in this submission and have been instrumental in shaping our response to this call for evidence.

## **Executive Summary**

Unite the Union welcomes the Department for Business and Trade's consultation on bereavement leave, including for pregnancy loss. It is clear that the absence of a statutory framework is incompatible with this government's agenda to make work pay. We encourage the Government to be bold in its ambition to set a new statutory right to bereavement leave, with a comprehensive framework that delivers meaningful, equitable support to bereaved workers, so that they are supported through their grief with guarantees of job security. This is particularly necessary for those who experience pregnancy loss.

Drawing on Unite policy, collective bargaining experience, and TUC Congress policy, including the TUC Pregnancy Loss Review (2024), our response outlines a rights-based, inclusive approach grounded in equality, dignity, and good work principles.

Unite's central position is that bereavement leave must be **paid, inclusive, flexible, and worker-led**, and must reflect the diverse realities of modern working lives and family structures. Restrictive, title-based definitions of family and rigid procedural requirements risk excluding those most affected by bereavement and pregnancy loss, particularly women, LGBT+ workers, migrant workers, disabled workers, carers, and young workers.

### **Key recommendations**

- **Eligibility based on the significance of the relationship**, not on legal or formal status. Bereavement leave should cover chosen family, foster and kinship carers, and significant personal relationships, including in cases of pregnancy loss. This approach reflects union-negotiated best practice and is essential to avoid indirect discrimination.
- **Inclusive recognition of pregnancy loss as bereavement, not sickness.** Bereavement leave should apply to miscarriage, stillbirth, termination for medical reasons, neonatal death, incomplete miscarriage, loss in multiple pregnancies, and pregnancy loss resulting from trauma or violence. Leave should be available to all those significantly affected, not only to the person who experienced the pregnancy loss.
- **A day-one right to a minimum of two weeks' paid bereavement leave**, in line with longstanding union policy. Unpaid leave acts as a deterrent, particularly for low-paid and insecure workers, and undermines the purpose of the entitlement.
- **No hierarchy of grief or entitlement.** The same amount of leave should apply across all bereavement scenarios and relationships, ensuring fairness, consistency, and equal treatment at work.

- **Maximum flexibility in when and how leave is taken, including:**
  - worker choice over when leave begins.
  - the ability to take leave in a single block or in shorter units.
  - a minimum window of 56 weeks, with flexibility to take leave beyond this where needed. This flexibility is particularly important for pregnancy loss and for workers who require reasonable adjustments under the Equality Act 2010.
- **Proportionate notice and evidence requirements.** No notice should be required in the immediate aftermath of bereavement. Where leave is taken later, reasonable notice may be given using any communication method. Unite supports a **self-declaration model** rather than routine evidence requirements, to protect dignity, avoid intrusive practices, and comply with UK GDPR principles on data minimisation and privacy.
- **Strong supporting measures alongside legislation,** including statutory guidance in consultation with trade unions, model bereavement policies, specific guidance on pregnancy loss, manager training, effective enforcement, and explicit recognition of the role of collective bargaining in raising standards.
- **Statutory rights for equality reps,** equality reps play a crucial role in monitoring gender pay gaps, progression barriers, and return-to-work support. Statutory rights for equality reps would give them time off, training, and protection to effectively monitor how leave policies are applied, ensuring discriminatory practices do not undermine them.

In summary, Unite urges the Government to ensure that statutory bereavement leave advances equality, protects health and dignity at work, and reflects lived experience. A paid, inclusive, and flexible framework, supported by clear guidance and enforcement, would deliver genuine protections for workers during difficult times, improve retention, and strengthen the economy by strengthening industrial relations.

## Part One: Eligibility

### Eligibility for bereavement leave for the loss of loved ones

#### **Question 1 – Which relationships between the employee and the person who has passed away should qualify for the bereavement leave entitlement?**

**Unite agrees with option (d):** *eligibility should be based on the significance of the relationship to the worker, rather than legal or formal titles, including foster carers, kinship caregivers and chosen family.*

This position reflects Unite policy on pregnancy loss, women's equality and bereavement leave, and aligns with the TUC Pregnancy Loss Review (2024)<sup>1</sup> and wider TUC policy calling for inclusive statutory bereavement rights that reflect the realities of modern working lives.

This is especially relevant for LGBT+ workers, whose family structures are more likely to fall outside traditional legal definitions, and for migrant workers, whose closest family members may not be legally recognised in the UK or may reside transnationally. Restrictive definitions would therefore disproportionately exclude those most in need of protection.

Unite's equality work consistently demonstrates that strict, title-based definitions of family disadvantage groups overlook those already experiencing structural inequality at work. This includes, besides women and pregnant workers, such groups as:

- LGBT+ workers, for whom chosen family often plays a central role in care, support and bereavement.
- Migrant workers, whose key relationships may not align with UK legal or cultural definitions of family.
- Disabled workers, who may rely on friends, non-relatives or informal carers as primary sources of support.
- Carers and care-experienced workers, including those supported by kinship caregivers or foster carers rather than biological parents.

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<sup>1</sup> TUC: **Supporting workers experiencing miscarriage and pregnancy loss.** TUC submission to the Women and Equalities Select Committee. Published December 2024. Link: <https://www.tuc.org.uk/research-analysis/reports/supporting-workers-experiencing-miscarriage-and-pregnancy-loss>

- Young workers who are more likely to be unmarried and not in civil partnerships, live in blended, informal or non-traditional family arrangements, rely on friends, siblings, extended family or carers rather than parents or spouses and be in insecure or lower-paid work with limited access to discretionary compassionate leave.

Many union-negotiated bereavement and compassionate leave policies already operate successfully on this basis, demonstrating that a relationship-based approach is both practical and proportionate.

**Unite argues that statutory bereavement leave must be inclusive and non-hierarchical, grounded in trust and dignity and sufficiently flexible to reflect diverse family and caring relationships.**

Uncertainty arises from a lack of statutory guidance, not from inclusive definitions. Union-negotiated agreements and public-sector policies show that non-exhaustive, relationship-based definitions work effectively when supported by clear guidance and good-faith decision-making.

Unite is clear that the costs associated with inclusive bereavement leave are minimal and are outweighed by improved retention, reduced absenteeism and better mental health outcomes. In cases of pregnancy loss, inadequate support often results in longer sickness absence and workforce exit, which are significantly more costly.

Requiring proof of personal relationships or grief would be intrusive and harmful, particularly for LGBT+ workers, migrant workers, disabled workers and carers. A presumption of trust, with limited discretion for employers in exceptional cases, is consistent with dignity at work principles and existing statutory rights.

**Unite supports a statutory framework based on the loss of a person with whom the worker had a significant personal relationship, including in cases of pregnancy loss, supported by:**

- non-exhaustive statutory guidance with clear examples.
- a presumption of trust in workers' self-identification.
- protection against unreasonable refusal by employers.

**Eligibility for bereavement leave for pregnancy loss**

**Question 3 – Should bereavement leave for pregnancy loss be restricted to the person who has physically experienced the pregnancy loss?**

No.

#### **Question 4 – If your answer is no, who else should be able to take leave?**

Pregnancy loss should be recognised as bereavement, not sickness, including miscarriage, stillbirth, termination for medical reasons and neonatal death. The TUC Pregnancy Loss Review<sup>2</sup> similarly found that the absence of statutory bereavement rights for pregnancy loss leads to inconsistency, employer discretion and unequal treatment.

Pregnancy loss is not experienced in isolation. Unite and the TUC have both highlighted that workers affected by pregnancy loss often rely on support from people who may not be legally recognised family members, including:

- Partners or co-parents who are not married or in a civil partnership.
- Former partners or partners in non-traditional family arrangements.
- Close friends or chosen family.

Restrictive, title-based definitions would undermine these objectives and risk entrenching inequality, particularly for workers with protected characteristics. For these groups, bereavement following pregnancy loss can be just as profound, regardless of legal status. Excluding such relationships risks indirect discrimination and undermines the principle of equality at work.

Unite believes that an inclusive, relationship-based approach to bereavement leave, including in cases of pregnancy loss, is necessary to ensure compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED), which requires due regard to the need to eliminate discrimination, foster good industrial relations and advance equality of opportunity for workers with protected characteristics as follows:

#### **1. Sex**

Unite's women's equality policy has long highlighted that the lack of statutory protection following pregnancy loss reinforces gender inequality. Women are more likely to return to work prematurely, have bereavement treated as sickness absence and experience stigma and silence around reproductive loss. The TUC has similarly warned that inadequate bereavement rights for pregnancy loss negatively affect women's health, wellbeing and labour market participation. Inclusive bereavement leave, based on the significance of the relationship, is therefore a core component of gender equality at work<sup>3</sup>.

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<sup>2</sup> TUC: **Supporting workers experiencing miscarriage and pregnancy loss**. TUC submission to the Women and Equalities Select Committee. Published December 2024. Link: <https://www.tuc.org.uk/research-analysis/reports/supporting-workers-experiencing-miscarriage-and-pregnancy-loss>

<sup>3</sup> TUC: **Supporting workers experiencing miscarriage and pregnancy loss**. TUC submission to the Women and Equalities Select Committee. Published December 2024. Link:

Women are disproportionately affected by pregnancy loss and its physical and psychological impacts. Restricting bereavement leave to narrow, legally defined relationships risks reinforcing gender inequality by:

- Increasing the trauma and emotional harm following pregnancy loss by isolating a woman from a key support at a time of acute distress.
- increasing pressure to return to work prematurely.
- perpetuating stigma around reproductive loss.

An inclusive, relationship-based entitlement advances equality of opportunity for women and supports their health, wellbeing and labour market participation.

## **2. Sexual orientation**

LGBT+ workers are more likely to rely on chosen family or non-traditional family structures. Restricting bereavement leave to legally recognised relationships risk indirect discrimination against LGBT+ workers whose significant relationships may not be captured by narrow definitions. A relationship-based approach advances equality by recognising diverse family forms and support networks.

Furthermore, Trans workers may face estrangement from biological family members and rely on chosen family for emotional and practical support. Excluding these relationships from bereavement leave entitlement risks compounding disadvantage and undermining dignity at work. Inclusive definitions help foster good relations and advance equality for trans workers.

## **3. Race and ethnicity**

Workers from Black, Asian and minority ethnic communities, and migrant workers, may have extended, transnational or non-nuclear family structures. Restrictive definitions risk indirect discrimination and unequal access to bereavement leave, particularly where close relationships are not legally recognised in the UK. A relationship-based entitlement better reflects cultural diversity and advances equality of opportunity.

## **4. Disability**

Disabled workers may rely on friends, non-relatives or informal carers as primary sources of support. The death of such a person can have a profound impact on their ability to work and live independently. Excluding these relationships risks indirect discrimination and undermines reasonable support for disabled workers.

## 5. Age

As explained in Question 1, young workers are particularly likely to be disadvantaged by restrictive definitions of family. In particular, young women are disproportionately affected by pregnancy loss and are more likely to lack workplace support or confidence to challenge employer decisions. A relationship-based entitlement ensures young workers are not excluded from bereavement leave due to their age, family status or employment insecurity, advancing equality of opportunity across age groups.

Additionally, restricting entitlement based on marital or civil partnership status risks disadvantaging unmarried partners and co-parents, including many young workers and those in insecure housing or employment situations. A relationship-based framework avoids privileging certain family forms and supports equality regardless of legal status.

## 6. Carers and socio-economic inequality

While caring status and socio-economic background are not protected characteristics under the Equality Act, Unite notes that young carers and care-experienced young workers are particularly affected by restrictive definitions of family. Inclusive bereavement leave supports the broader aims of the PSED by reducing disadvantage and supporting workforce participation.

In summary, a relationship-based bereavement leave entitlement reduces the risk of indirect discrimination against protected groups, advances equality of opportunity for women, LGBT+ workers, migrant workers, disabled workers and young workers and reflects the lived realities of pregnancy loss and bereavement.

## Types of Pregnancy Loss

### **Question 5 – Do you agree that all the types of pregnancy loss listed above by the Government should be eligible for bereavement leave?**

Yes. However, the list of pregnancy loss types outlined in the consultation is not comprehensive and risks excluding significant numbers of workers from statutory protection. It should be expanded to include partial or incomplete miscarriage, where pregnancy tissue is not fully expelled, and medical or surgical intervention is required, as well as cases involving twin or multiple pregnancies where one foetus dies while the remaining foetus or foetuses are carried to term. Such situations can involve prolonged, highly traumatic pregnancies with serious physical and psychological consequences, including increased risks of antenatal and postnatal depression. The list provided also fails to recognise pregnancy loss resulting from trauma or violence, including loss caused by accident, injury, or assault, such as domestic abuse.

Excluding these experiences would create unjustifiable gaps in workplace rights and is inconsistent with employers' existing duties under equality and health and safety

legislation to safeguard workers' physical and mental health and to prevent discrimination related to pregnancy, maternity, sex, and disability. Any statutory framework on bereavement and pregnancy loss must, therefore, be inclusive by design, ensuring that all workers experiencing pregnancy loss are entitled to appropriate leave, pay, and protection from detriment or dismissal.

Pregnancy loss falls squarely within the scope of pregnancy and maternity protections. Failure to recognise pregnancy loss as bereavement, and to account for the significant relationships involved, risks discriminatory treatment of pregnant workers and those who have recently been pregnant. A flexible definition ensures that workers experiencing miscarriage, stillbirth, termination for medical reasons or neonatal death are not disadvantaged by restrictive eligibility criteria.

**Question 6 – Are there any additional forms of pregnancy loss that should be included?**

Yes, as explained above.

## Part Two: When and how bereavement leave can be taken

### Duration of leave

**Question 7 – How long should unpaid bereavement leave be?**

Unite does not support unpaid bereavement leave as the statutory default. In accordance with TUC policy, bereavement leave, including in cases of pregnancy loss, **should be recognised as a day-one entitlement with a minimum of two weeks' paid leave**. This aligns with longstanding TUC Congress policies, including **TUC Congress 2017 (Motion 54: Bereavement Leave)** and **TUC Congress 2021 motions** on pregnancy loss and maternity discrimination, which call for paid bereavement leave and recognise pregnancy loss as an issue of workplace equality.

Unite further recognises that unpaid leave acts as a significant deterrent to workers taking necessary time off following bereavement or pregnancy loss, especially for low-paid, insecure, and precarious workers. An unpaid statutory entitlement, therefore, risks undermining the policy objective by discouraging affected workers from taking the necessary leave to recover physically and psychologically, attend medical appointments, and deal with the immediate consequences of loss.

A statutory minimum of two weeks' paid bereavement leave aligns with established practice in many union-negotiated collective agreements across both the public and private sectors and is essential to safeguarding workers' health, dignity, and equality at work. Statutory provision should operate as a floor, not a ceiling, preserving the ability for

collective agreements and employer policies to offer enhanced paid leave, and protecting workers from detriment or dismissal when additional time is necessary. This approach is consistent with employers' obligations under equality and health and safety legislation.

**Question 8 – Do you think employees should be offered the same amount of leave for all types of scenarios, and all relationships to the deceased, that you have selected above?**

Yes. Unite is clear that there should be no hierarchy of grief, just as there must be no hierarchy of equality. Grief is a profoundly personal experience, and its effect on an individual is not determined by the legal status of a relationship or the specific circumstances of a loss. Therefore, a consistent entitlement across all types of bereavement and relationships to the deceased is crucial to ensure fairness, consistency, and equal treatment at work.

Differentiating entitlements based on relationships or scenarios risks producing arbitrary outcomes, creates confusion for employers and workers, and raises the potential for discrimination. A single, consistent entitlement offers clarity, supports equality principles, and ensures that all workers can grieve and recover without detriment, regardless of the nature of their loss.

**Question 10 – For Bereavement leave, which of the following options for the leave entitlement to begin would be most appropriate?**

Unite supports an approach that offers flexibility while maximising protection for workers. Bereavement leave should be available from the date of death or pregnancy loss, with the explicit right for the worker to elect for the leave to begin from the date they become aware of the death or pregnancy loss, or to take the leave at a later time if it better suits their circumstances.

Grief, shock, and trauma do not follow a fixed timetable, and in many cases—particularly with pregnancy loss, neonatal death, or when a worker is not immediately informed—it may be neither possible nor appropriate for leave to start automatically on the date of the loss. A rigid approach risks undermining the purpose of bereavement leave and could disadvantage workers who are unable to take leave immediately due to medical needs, caring responsibilities, or work-related constraints.

The statutory framework should therefore empower the worker, allowing bereavement leave to be taken in a way that promotes recovery and wellbeing, while also providing protection from detriment or dismissal. This aligns with established practice in union-negotiated agreements and adheres to principles of equality, health, and safety.

## Flexibility to take the leave

**Question 11 – Which of the following options for taking bereavement leave would be most appropriate?**

**d) An alternative arrangement (please describe)**

Unite strongly supports a flexible, worker-led approach to bereavement leave. Leave should be capable of being taken either as a continuous block or discontinuously, in units of one day or more, according to the needs of the worker's needs. Control over how leave is taken should rest with the employee, not the employer.

Grief is deeply personal and does not follow a linear or predictable pattern. Limiting leave to fixed blocks risks excluding those who need time at specific moments, such as anniversaries, religious observances, inquests, medical appointments, or periods of acute distress. This is especially significant in cases of pregnancy loss, where workers may require a combination of immediate leave for physical recovery and additional leave later for emotional support.

Flexible leave provisions also support reasonable adjustments and protections under the Equality Act 2010. Workers experiencing significant mental or physical health impacts following bereavement or pregnancy loss may meet the Act's definition of disability, and employers have a legal duty to make reasonable adjustments. A statutory framework that allows leave to be taken flexibly ensures compliance with these duties, prevents indirect discrimination, and safeguards workers' physical and mental wellbeing, in line with both union-negotiated practice and health and safety obligations.

## Window to take the leave

**Question 12 – Which of the following windows for taking bereavement leave would be most appropriate?**

Unite, in line with TUC policy on bereavement leave (including Congress motions 2017, Motion 54, and 2021 pregnancy loss and maternity-related motions), supports a flexible, worker-led approach to the timeframe for taking bereavement leave. While a minimum period of 56 weeks accommodates anniversaries, the statutory entitlement should permit workers to request leave beyond this period where necessary, acknowledging the highly personal nature of grief and recovery, including following pregnancy loss.

Flexibility allows workers to take leave when it is genuinely necessary for important dates, cultural or religious observances, medical appointments, or delays in processing grief, and helps prevent undue pressure on low-paid or insecure workers. This approach aligns with reasonable adjustments and disability protections under the Equality Act 2010 and

supports employers' responsibilities under health and safety legislation, while promoting clarity, fairness, and equal treatment in bereavement leave.

## Part three: Notice and Evidence

### Notice requirements

**Question 13 – Do you think employees should be required to provide notice they intend to take bereavement leave to their employer?**

**I. If the leave is taken very soon after the bereavement (e.g. within the first few days or weeks)**

No. Workers experiencing recent bereavement or pregnancy loss should be able to take leave without the burden of advance notice. Unite, in accordance with TUC policy, believes that requiring notice in the immediate aftermath could create unnecessary barriers at a time of acute distress. Employers should instead provide clear guidance and a reasonable timeframe for employees to submit supporting evidence retrospectively, ensuring transparency while prioritising the worker's wellbeing.

**II. If the leave is taken at a later period (e.g. several weeks or months after the bereavement):**

When bereavement leave is requested at a later date, it is reasonable for workers to provide notice so the employer can plan cover. Employers should also specify a clear timeframe for submitting supporting evidence, ensuring fairness and transparency. Any notice or evidence requirements should be proportionate, reasonable, and considerate of the individual circumstances of grief.

**Question 14 – If you think that notice should be given for bereavement leave, in what form should it be given?**

*a) The same as Parental Bereavement Leave (any form of notice is acceptable).*

Bereavement leave, like parental bereavement leave, should allow flexible and accessible methods of notice. Employees should be able to inform their employer through any reasonable communication method, such as text, messaging apps, email, or phone call, depending on what is practical and least burdensome during a time of grief.

Flexibility in how notice is given recognises the emotional and practical challenges faced by workers following bereavement or pregnancy loss. Requiring only formal written notice can cause unnecessary stress, act as a barrier to taking leave promptly, and disproportionately impact low-paid or precarious workers.

This approach aligns with TUC guidance and existing best practice for parental bereavement leave, ensuring workers can exercise their rights without undue administrative burden, while allowing employers to maintain transparency and manage operational needs.

## Evidence requirements

**Question 15 – For bereavement leave do you think that employees should be required to provide evidence of a bereavement to their employer?**

**d) No, but they should be required to sign a declaration that they are eligible to take bereavement leave, and the reason they are taking leave is due to a bereavement or pregnancy loss.**

Unite does not support a requirement for employees to routinely provide evidence of bereavement or pregnancy loss to access bereavement leave. Requiring documentary proof at a time of grief or trauma risks causing unnecessary distress and can create barriers in cases of pregnancy loss or early miscarriage, where formal documentation may not exist. Bereavement and pregnancy loss involve highly sensitive personal and medical information, and routine evidence requirements risk the unnecessary collection, processing, and retention of such data.

In line with TUC policy and established practice for parental bereavement leave, a self-declaration model is the most appropriate and proportionate approach. This approach supports dignity and trust, avoids intrusive questioning, and reduces the risk of unequal or inconsistent treatment by employers.

An evidence-based system also reflects essential data protection and privacy considerations. This would be difficult to reconcile with UK GDPR principles, including data minimisation, purpose limitation, and proportionality. A self-declaration approach limits the handling of sensitive personal data to what is strictly necessary, protecting workers' privacy while providing employers with appropriate assurance.

Employers should therefore be required to operate clear, transparent self-declaration processes, ensuring bereavement leave is treated as a statutory right and that workers are not deterred from taking leave through fear of scrutiny or intrusion.

## Other Policy Steps

**Question 18 - Do you have views on other steps the Department could take to help employers implementing the new statutory bereavement leave and support their employees?**

**Unite recommends the following accompanying interventions:**

**1. Statutory employer guidance (in consultation with Trade Unions)**

Unite calls on the Department for Business and Trade (DBT) to publish clear statutory guidance, in consultation with unions, setting out minimum standards for bereavement leave, including pay, flexibility, notice, and evidence requirements. The guidance should make clear that statutory entitlements are a floor, not a ceiling, and include examples of good practice.

**2. Model workplace bereavement policies**

DBT guidance should include a model bereavement policy for employers to adopt or adapt. This should consist of inclusive definitions of bereavement and pregnancy loss, flexible arrangements for taking leave, protection from detriment or discrimination, and clear expectations regarding confidentiality and privacy.

**3. Guidance on equality, health and safety, and reasonable adjustments**

Accompanying guidance should explicitly set out how bereavement leave interacts with employers' existing duties under the **Equality Act 2010**, including pregnancy and maternity protections and the duty to make reasonable adjustments, as well as obligations under health and safety legislation to protect mental wellbeing at work.

**4. Specific guidance on pregnancy loss**

In line with TUC policy, the DBT should issue dedicated guidance on pregnancy loss, recognising its physical and psychological impacts at all stages of pregnancy and the need for flexibility, sensitivity, and protection from detriment, including in relation to sickness absence and performance management.

**5. Manager and HR training resources**

The DBT should work with ACAS and the trade union movement to develop training and awareness materials for line managers and HR professionals on responding appropriately to bereavement, handling requests sensitively, and avoiding intrusive or discriminatory practices.

**6. Clear enforcement and awareness measures**

The DBT should ensure that workers are aware of their rights through public information campaigns and that ACAS is adequately resourced to provide advice and early conciliation. Effective enforcement mechanisms are essential to ensure that the new entitlement is meaningful in practice.

## **7. Recognition of Collective Bargaining**

Guidance should explicitly recognise the role of trade unions and collective bargaining in delivering enhanced bereavement support. Employers should be encouraged to engage with recognised unions to negotiate improved paid leave and support arrangements beyond the statutory minimum.

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This submission is submitted on behalf of Unite the Union.

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